

REMARKS

As a preliminary matter, Applicants again respectfully request full acknowledgement and consideration of the Information Disclosure Statements (“IDS”) filed October 20, 2003 and August 6, 2004. On the October 20, 2003 Form PTO-1449, the Examiner has drawn a line through the listing of the JP 10-307567 reference, and on the August 6, 2004 Form PTO-1449, the Examiner has drawn a line through the listing of the JP 63-37394 reference, indicating that the Examiner has refused to consider these references, but without giving any explanation for the refusals. Applicants submit that there is no valid basis for either refusal, and the Examiner is requested to resubmit initialed copies of both Forms PTO-1449 indicating that both references have been acknowledged and considered.

Claims 32-34 stand rejected under 35 U.S.C. 102(b) as being anticipated by Lee (U.S. 5,426,447). Applicants respectfully traverse this rejection because the reference fails to teach (or suggest) a reset circuit that resets the potentials of the common signal lines to a predetermined potential within a given period, as in claim 32 of the present invention, as amended.

The Examiner asserts that Lee’s precharge circuit is analogous to the reset circuit of the present invention. Even if such an analogy were true (which Applicants do not concede), the Examiner should see that the clarifications made herein to the claims render any such further interpretation unreasonable. Claim 32, for example, has been amended herein to clarify that the reset circuit affirmatively resets the potentials of the common signal lines. In other words, the previous language relating to the signal lines

additionally has been removed from the claim. The Examiner's specific analogies to the Lee reference appear to all relate to only the signal lines (see Fig. 2), and not the common signal lines, which are defined in the present Application as separate and distinct. Accordingly, the rejection of claims 32-34 based on Lee is respectfully traversed for at least these reasons.

Claim 39 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lee in view of Enami et al. (U.S. 5,892,493). Applicants respectfully traverse this rejection for at least the reasons discussed above. Claim 39 depends from claim 32, and therefore includes all of the features of the base claim, plus additional features. Claim 39 is condition for allowance for at least the reasons discussed above in traversing the rejection of independent claim 32 on the basis of Lee alone.

Applicants further traverse the rejection of claim 39 because no teaching or suggestion has been cited from the prior art that indicates any actual desirability, to one of ordinary skill in the art, for making the actual combination proposed by the Examiner. The only prior art cited to support the proposed combination of Lee with Enami is col. 3, lines 41-43 of Enami, but this text portion simply has no relation whatsoever to the proposed combination with Lee. The cited text merely claims how Enami's own invention, *practiced entirely within the context of Enami's own disclosure*, should lead to an image "displayed with high quality even if the duration of application of data voltage is short." In other words, the cited text is nothing more than a desirable goal sought by Enami, and otherwise is completely silent regarding how such a broadly stated goal would, or even could, be accomplished when combined with Lee.

Section 2143.01 of the MPEP requires that the Examiner be able to cite to where the desirability of the proposed combination itself is taught or suggested in the art, and not merely the desirability of a particular element in a reference, in the context of only that particular reference. In the present case, however, this requirement has not been met. According to the Examiner's stated rationale, any two references in this field of art should be capable of combination, no matter how unworkable the resulting combination. A "high quality image" is a well-known goal of practically any and every device in the field. It is also well-known in the field though, that many particular devices exhibiting "high quality images" – whether having short or long data voltage applications – could never be simply put together on such a broad basis only and result in a combination device that is even workable. Accordingly, no rationale has been presented that justifies the actual combination of the references, and the rejection of claim 39 is therefore further deficient for at least these reasons as well.

Claim 36 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lee in view of Kimura (U.S. 6,281,826). Applicants respectfully traverse this rejection for at least the reasons discussed above. Claim 36 depends from claim 32, and is therefore in condition for allowance for at least the reasons discussed above in traversing the rejection of independent claim 32 on the basis of Lee alone.

The rejection is further deficient for reasons similar to those discussed above with respect to claim 39. The Examiner only proposes to justify the combination of Lee with Kimura on the basis of only Kimura's broadly stated goal to "increase speed of driving the liquid crystal." As discussed above, common goals do not justify the

combination. The references themselves must teach or suggest how the combination itself would and could accomplish the broadly stated goal. In both cases, the Examiner appears to have simply presumed the desirability of the combination, a presumption which is expressly forbidden under Section 2143.01.

Claim 38 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lee in view of Soneda et al. (U.S. 4,803,480). Applicants respectfully traverse this rejection for at least the reasons discussed above. Claim 38 depends from claim 32, and is therefore in condition for allowance for at least the reasons discussed above in traversing the rejection of independent claim 32 on the basis of Lee alone. This rejection is also further deficient under Section 2143.01. Once again, the Examiner has stated nothing more than a broadly stated goal sought by one reference (Soneda's "display of the still picture over a long time period") to justify the combination. Nothing in the brief text portion cited by the Examiner has any relation to how or why such a goal would, or even could, be accomplished when Soneda is combined with Lee. As with the deficient combinations discussed above, the Examiner does not even explain *how* the two references can even be combined. The combination has again been presumed.

New claim 43 has been added to recite another embodiment and/or combination of features of the present invention. Claim 43 depends from independent claim 32, and should therefore be in condition for allowance over all of the cited art of record for at least the reasons discussed above. Claim 43 separately recites limitations relating to the signal lines separately, similar to the subject matter which was deleted from independent claim 32. Accordingly, the Examiner should find that claim 43

introduces no new matter, nor does it raise any new issues requiring further search or consideration. Entry and allowance of new claim 43 are therefore respectfully requested.

For all of the foregoing reasons, Applicants submit that this Application, including claims 32-34, 36, 38-39, and 43, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,
GREER, BURNS & CRAIN, LTD.

By

A handwritten signature in black ink, appearing to read "Josh C. Snider", is written over a horizontal line.

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